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12
13 UNITED STATES DISTRICT COURT
14
15 EASTERN DISTRICT OF CALIFORNIA

16 PERRY J. FERRUCCI AND BETSY P.
17 FERRUCCI,

18 Plaintiffs,

19 v.

20 BANK OF AMERICA, N.A.; EQUIFAX
21 INFORMATION SERVICES, LLC;
22 EXPERIAN INFORMATION SOLUTIONS,
23 INC.,

24 Defendants.

25 Case No. 2:20-cv-01043-JAM-KJN

Hon. John A. Mendez

**STIPULATION AND ORDER RE:
EXTENSION OF DEADLINE TO FILE
DISPOSITION DOCUMENTS**

Complaint filed: May 21, 2020

17 Plaintiffs Perry Ferrucci and Betsy P. Ferrucci along with the Defendant Experian
18 Information Solutions, Inc. (“Experian”), pursuant to Local Rule 160(d), hereby stipulate and
19 agree that good cause exists for extending the deadline by which to file disposition documents by
20 thirty (30) days.

21 1. Plaintiffs filed a notice of settlement on February 2, 2022. (ECF No. 55).

22 2. That same day, the Court ordered the Parties to file dispositional documents within
23 sixty (60) days in accordance with Local Rule 160. (ECF No. 56).

24 3. On April 4, 2022, the Parties filed a stipulation seeking an extension of thirty (30)
25 days to file the disposition documents. (ECF. No. 59). The Court granted the stipulation on April

1 5, 2022. (ECF. No. 60).

2 4. The Parties have agreed to the terms of the final settlement agreement. The lone
3 remaining item is for Experian to distribute the settlement payment to Plaintiff. Within three
4 business days of receiving the payment, Plaintiff will file the disposition documents.

5 5. The Parties believe that allowing a thirty (30) day extension will serve the ends of
6 judicial economy.

7 6. The Parties have agreed to seek this extension for good cause, in good faith, and
8 not for the purpose of delay. The Parties do not anticipate any need to request additional time
9 beyond the thirty (30) day period requested herein.

10 7. Accordingly, the Parties jointly stipulate to and request of this Honorable Court
11 that it grant a thirty (30) day extension to file disposition documents.

12 WHEREFORE, Plaintiff and Experian pray that this Court extend the above-referenced
13 deadline and execute the proposed Order regarding the same, which is filed herewith, and for all
14 other just and appropriate relief.

15 Dated: May 6, 2022

16 JONES DAY

17 By: /s/ Matthew T. Billeci
18 Matthew T. Billeci

19 Attorneys for Defendant
20 EXPERIAN INFORMATION SOLUTIONS,
21 INC.

22 ZEMEL LAW, LLC

23 By: /s/ Daniel Zemel
24 Daniel Zemel, Esq.
25 Attorney for Plaintiff
PERRY J. FERRUCCI and BETSY P.
FERRUCCI

ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS HEREBY ORDERED that the parties shall have an additional thirty (30) days from the date of this order to file dispositional documents in accordance with the provisions of Local Rule 160.

Dated: May 6, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE